

I request the following records regardless of whether maintained in paper or electronic format:

1. Each administrative order issued by EPA Region 8 under the Safe Drinking Water Act that (a) concerns the East Poplar Oil Field in Roosevelt County, Montana, the Town of Poplar, Montana, the Fort Peck Indian Reservation in the state of Montana, or any other real property within Township 28 and/or Township 29, North Range 51 East (these geographic locations and descriptions are hereafter referred to in common as “the East Poplar Oil Field”) and (b) to which Pioneer Natural Resources USA, Inc., Pioneer Natural Resources Company, or any other entity the name of which includes the word “Pioneer” is (or are) the only respondent(s) including without limitation the administrative orders issued to Pioneer Natural Resources USA, Inc. on or about August 21, 2001 in Docket No. SDWA-08-2001-27 and in November 2016 in Docket No. SDWA-08-2017-0005;
2. All EPA records concerning, obtained in response to, resulting from or otherwise related to the Biere 1-22 oil well that is addressed in the above-referenced administrative order in Docket No. SDWA-08-2017-0005;
3. All EPA records concerning, obtained in response to, resulting from or otherwise related to communications between any EPA employee or representative and any employee or representative of the State of Montana (including any of its agencies), Roosevelt County Montana (including any of its agencies), the Town of Poplar, Montana or any other EPA records insofar as they concern the East Poplar Oil Field;
4. All EPA records concerning, obtained in response to, resulting from or otherwise related to communications between any EPA employee or representative and any employee or representative of the following entities insofar as such communications concern the East Poplar Oil Field (as defined in paragraph 1 above):
 - a. The Fort Peck Assiniboine & Sioux Tribes
 - b. The U.S. Geological Survey
 - c. Zimmerman, Inc.
 - d. Dun O’Connor
 - e. Faith O’Connor
 - f. Michael E. Lockman
 - g. Lockman, Inc.
 - h. Samson Resources Corporation
 - i. Samson Resources Company
 - j. Pioneer Natural Resources USA, Inc.
 - k. Pioneer Natural Resources Company
 - l. W.R. Grace & Company-Conn.
 - m. AMARCO Resources Corporation
 - n. EPEC-Altamont Corporation
 - o. Marathon Oil Company
 - p. Ballard Petroleum Holdings
 - q. Nautilus Poplar, LLC

- r. Grace Petroleum
- s. C.H. Murphy
- t. Poplar Resources, LLC
- u. Juniper Petroleum Corp.
- v. Mesa Operating Limited Partnership
- w. Michael D. Cok
- x. Travis W. Kinzler
- y. Jonathan M. Cok
- z. Cok Kinzler PLLP
- aa. Trent M. Gardner
- bb. Kyle W. Nelson
- cc. Goetz, Baldwin & Geddes, P.C.
- dd. Richard Angell
- ee. J. Michael Bailey
- ff. Parsons Behle & Latimer

Please provide the requested records in electronic format (preferably a compact disk). Requester understands that reimbursement of EPA's expenses may be required, and asks that you advise requester in advance if such costs will exceed \$500. Please call requester (304-258-8735 or 703-307-6617) with any questions. Thank you